

Joel S. Cohen, PC
225 Broadway, Suite 1203
New York, NY 10007
Tel: 212-571-8899
Fax: 212-571-9557
Email: jcesq99@gmail.com

July 28, 2014

The Honorable Joan M. Azrack
United States Magistrate Judge
United States District Court
225 Cadman Plaza
Brooklyn, NY 11210

Re: *Patrica Ranta, et al. v. City of New York, et al.*,
Docket No. 1:14-cv-03794-SLT-JMA

Dear Magistrate Judge Azrack:

I write to request permission to enter a limited appearance on behalf of defendant Louis Scarella in this matter, for the sole purpose of requesting a 60 day extension of time for Mr. Scarella to file his answer to the Complaint. I have been contacted by Assistant Corporation Counsel Brian J. Farrar who represents the City in this matter. He advised me that the City is in the process of deciding whether it will represent Mr. Scarella, and that this decision will take at least several more weeks if not longer. As well, the City has written to Judge Townes, requesting a pre-motion conference for purposes of moving to dismiss pursuant to F.R.C.P. 12(b)(6). In order to avoid a possible default on the part of Mr. Scarella I respectfully ask that this letter be deemed a limited appearance on his behalf, as well as a request for a 60 day extension of time for him to file an answer.

Very truly yours,

/S

Joel S. Cohen (JC6998)

cc: Peter Caro Dee pdee@mavrolaw.com
Brian Jeremy Farrar bfarrar@law.nyc.gov